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November 6, 2025

VIA USPS MAILING

Keith Allen, M21830
Attn: LEGAL MAIL
IDOC - Menard Correctional Center
P.O. Box 1000
Menard, IL 62259

Re: *Allen v. Wexford Health Sources, Inc. et al.*, Case No. 23-CV-3775-DWD

Dear Mr. Allen:

I write on behalf of Defendant Nicholas Florence, M.D., regarding your outstanding discovery responses. As you know, written discovery was first mailed to you on July 25, 2025, and re-served on October 6, 2025, following our phone call that same day. At present, responses to the following written discovery requests, re-served on October 6, 2025, were due on or about November 5, 2025:

- Interrogatories to Plaintiff;
- Requests for Production of Documents to Plaintiff; and
- Requests to Admit to Plaintiff.

To date, we have not received your responses. Please provide complete written responses, or otherwise contact our office, within fourteen (14) days of the date of this letter. If we do not receive your responses or hear from you by that time, we will proceed with filing a motion to compel and a motion to deem our Requests to Admit admitted.

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Respectfully Submitted,

Litchfield Cavo LLP

Zachary G. Stillman

ZGS/ZGS